

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 23-5109
(C.A. No. 19-1746)

MAHTAB ARSANJANI,

Appellant,

v.

UNITED STATES OF AMERICA, et al.,

Appellees.

CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Circuit Rule 27, Appellee United States of America (“United States”), respectfully moves to extend all deadlines. The United States’ and the District of Columbia’s replies are currently due by October 11, 2023. For the reasons set forth below, the United States, with the parties’ consent, requests that the Court extend the October 11, 2023, deadline to November 13, 2023. This is the second request for additional time and the Motion is filed more than five days prior to the October 11, 2023, deadline.

In this case, Appellant Mahtab Arsanjani alleges she was struck by a tree branch while walking on the sidewalk located at Constitution Avenue, NW, at or near its intersection with 9th Street, NW, in the District of Columbia on June 19, 2016.

There is good cause to grant this Motion. Unfortunately, the demands of undersigned counsel’s docket of active cases, and the swelling number of cases in

her office overall, have prevented undersigned counsel from completely conducting the research and consultation with the Smithsonian counsel and supervising Assistant United States Attorneys which are all necessary to finalize the United States' reply to Arsanjani's opposition. Additional time is necessary so that undersigned can continue to conduct legal research, confer with supervising Assistant United States Attorneys and the Smithsonian counsel, and finalize its reply. Also, additional time is needed so that the undersigned can submit any draft response for the Smithsonian and supervisory review prior to filing it with the Court. Consequently, in light of the above-referenced circumstances and undersigned counsel's busy schedule, the United States respectfully requests a reasonable amount of additional time, to and through November 13, 2023.

The requested extension would not prejudice the parties because the parties, through counsel, graciously consent to the extension and the District has also requested that their time be extended. Lastly, the requested extensions will not significantly delay the Court's resolution of this matter.

In light of the foregoing, the United States, with the parties' consent, requests that the Court extend the United States' and the District's deadline to file to their reply in support of their dispositive motions to November 13, 2023.

* * *

Dated: October 5, 2023

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

BRIAN P. HUDAK
JANE M. LYONS
Assistant United States Attorneys

/s/ Stephanie R. Johnson
STEPHANIE R. JOHNSON
Assistant United States Attorney
Civil Division
601 D Street, N.W.
Washington, D.C. 20530
(202) 252-7874
Stephanie.Johnson5@usdoj.gov

Attorneys for the United States of America

CERTIFICATE OF COMPLIANCE

The text of this Motion is prepared using 14-point Times New Roman typeface and consists of 355 words, as calculated by counsel's word processor.

/s/ Stephanie R. Johnson

Stephanie R. Johnson

Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of October 2023, I have caused the foregoing Consent Motion for Extension of Time to be served on parties' counsel by filing the Certificate on the Court's CM/ECF system. Counsel are registered users.

/s/ Stephanie R. Johnson

Stephanie R. Johnson

Assistant United States Attorney